

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-353 (LJL)

No. 24-cv-6563 (LJL)

**DECLARATION OF M. ANNIE HOUGHTON-LARSEN IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL THIRD-PARTY RYAN MEDRANO TO
PRODUCE DOCUMENTS RESPONSIVE TO PLAINTIFFS' DOCUMENT SUBPOENA**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this Court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned actions.

2. I submit this declaration in support of Plaintiffs' Letter-Motion to Compel third-party Mr. Ryan Medrano to produce documents in response to Plaintiffs' subpoena served under Federal Rule of Civil Procedure 45 (the "Document Subpoena").

3. Plaintiffs have received documents in third-party productions including an email from Mr. Medrano sent from his email at the giulianipartners.com domain to Joseph Ricci on October 7, 2024. A true and correct copy of this email is attached hereto as **Exhibit 1**.

4. On November 14, 2024, Plaintiffs emailed Mr. Medrano a copy of the Document Subpoena, Plaintiffs' Motion to Compel (24-mc-353, ECF No. 113), and the Court's November 14, 2024 Scheduling Order (*id.*, ECF No. 116) to his email at the domain giulianipartners.com. A

true and correct copy of Plaintiffs' email sending the Document Subpoena to Mr. Medrano is attached hereto as **Exhibit 2**. Mr. Medrano never responded to this email.

5. On November 14, 2024, Plaintiffs emailed Defendant's counsel a copy of the Document Subpoena, Plaintiffs' Motion to Compel (24-mc-353, ECF No. 113), the Court's November 14, 2024 Scheduling Order (*id.*, ECF No. 116), and copies of document subpoenas to Mr. Ted Goodman and Dr. Maria Ryan. A true and correct copy of Plaintiffs' email sending the Document Subpoena to Defendant's counsel is attached hereto as **Exhibit 3**.

6. On November 21, 2024, Mr. Rudolph W. Giuliani's business entity, Standard USA, LLC, served responses to Plaintiffs' information subpoena. A true and correct copy of Standard USA, LLC's information subpoena response is attached hereto as **Exhibit 4**.

7. On November 22, 2024, Plaintiffs emailed Defendant's counsel a copy of the Document Subpoena, Plaintiffs' Motion to Compel (24-mc-353, ECF No. 113), the Court's November 21, 2024 Scheduling Order (*id.*, ECF No. 141), and the Court's November 21, 2024 Order granting alternative service on Mr. Medrano (*id.*, ECF No. 143) with an instruction to provide the documents to Mr. Medrano. A true and correct copy of Plaintiffs' email sending the Document Subpoena to Defendant's counsel is attached hereto as **Exhibit 5**.

8. On December 4, 2024, Plaintiffs served Mr. Medrano a copy of the Document Subpoena and this Court's November 21, 2024 Order (24-mc-353, ECF No. 143) by email to Mr. Medrano's email at the domain giulianipartners.com. A true and correct copy of Plaintiffs' December 4, 2024 email to Mr. Medrano is attached hereto as **Exhibit 6**. A true and correct copy of the Document Subpoena is attached hereto as **Exhibit 7**.

9. On December 4, 2024, Plaintiffs served Mr. Medrano a copy of the Document Subpoena, Plaintiffs' Motion to Compel (24-mc-353, ECF No. 113), this Court's November 21,

2024 Order (*id.*, ECF No. 141), and this Court's November 21, 2024 Order (*id.*, ECF No. 143) via FedEx mail to Mr. Medrano at his home address at 27 Maryland Plaza, 2nd floor, St. Louis, MO 63108. A true and correct copy of the FedEx shipping confirmation on December 5, 2024 is attached hereto as **Exhibit 8**.

10. On December 13, 2024, and twice on December 14, 2024, the process server for Plaintiffs attempted to serve a subpoena to testify at a deposition on Mr. Medrano through in-person service. These attempts were unsuccessful. A true and correct copy of an affidavit of attempted service is attached hereto as **Exhibit 9**.

11. On December 17, 2024, Mr. Giuliani delivered a copy of his second amended initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). A true and correct copy of Mr. Giuliani's second amended initial disclosures is attached hereto as **Exhibit 10**.

12. As of the date of this filing, Mr. Medrano has not responded to the Document Subpoena.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 19, 2024.

s/ M. Annie Houghton-Larsen
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